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*Attorneys for Plaintiffs IDA JONES-LEWIS, individually and as heir of WILLIE LEWIS, deceased;  
The Estate of WILLIE LEWIS, by and through Steve Scow, Special Administrator*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

IDA JONES-LEWIS, individually and as heir of  
WILLIE LEWIS, deceased; The Estate of  
WILLIE LEWIS, by and through Steve Scow,  
Special Administrator;

Plaintiffs,

vs.

NAPHCARE, INC., an Alabama Corporation;  
KYLE MARTINEAU, in his individual  
capacity; KEVIN SAMA, in his individual  
capacity; RAY MONTENEGRO, in his  
individual capacity; STEVE TALIGATOS, in  
his individual capacity; JAY MICHAEL  
MARCOS, in his individual capacity; LAURA  
ROLSTON, in her individual capacity;  
LYNNETH DE LA ROSA, in her individual  
capacity,

Defendants.

CASE NO.: 2:19-cv-01638-JCM-BNW

**STIPULATION AND**  
**ORDER TO EXTEND BRIEFING**  
**DEADLINES TO DEFENDANTS'**  
**PARTIAL MOTION FOR SUMMARY**  
**JUDGMENT (ECF NO. 32)**

WHEREAS Defendants NAPHCARE, INC.; KYLE MARTINEAU; KEVIN SAMA; RAY  
MONTENEGRO; STEVE TALIGATOS; JAY MICHAEL MARCOS; LAURA ROLSTON; and  
LYNNETH DE LA ROSA collectively filed a Motion for Partial Summary Judgment on June 24,  
2020 (ECF No. 32).

Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for Plaintiffs to file their Response to Defendants' Motion for Partial Summary Judgment. The current deadline for Plaintiffs to respond is July 15, 2020. The new deadline for Plaintiffs to respond will be October 17, 2020.

This extension is the first request and is not for the purpose of delay but rather because the plaintiffs will need additional time to schedule and take all of the individual defendants' depositions, including FRCP 30(b)(6) witnesses. The additional time would allow receipt of transcripts and adequate time for briefing the response to Defendants' Motion for Partial Summary Judgment. Additionally, other witnesses will most likely need to be deposed in addition to the individual defendants and the parties' experts will also need time to review the deposition transcripts to incorporate any additional information into their respective opinion reports.

**IT IS SO STIPULATED AND AGREED.**

DATED this 14th day of July, 2020.

DATED this 14th day of July, 2020.

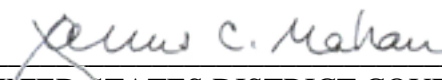
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**LAURIA TOKUNAGA GATES & LINN, LLP**

/s/ Andre M. Lagomarsino  
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 deceased; & The Estate of WILLIE LEWIS

/S/ PAUL CARDINALE  
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 Attorney for Defendants Naphcare, Inc., Laura  
 Ralston, Lynne Dela Rosa, Jay Marcos, Kyle  
 Martineau, Ray Montenegro, and Steve Taligatos

**IT IS SO ORDERED.**

  
 UNITED STATES DISTRICT COURT JUDGE

DATED: July 15, 2020